## ETHYL PETROLEUM ADDITIVES DIVISION



## **INTER-OFFICE**

To M. J. Bonaventure

Address

From

R. A. Phillips

ADDRESS

SUBJECT

CONSTRUCTION SAUGET PLANT SITE

DATE June 26, 1985

REFERENCE: MEMO EXCEPTION TO NO DIG ORDER IN PLANT - 6/19/85

J. L. SPARKS

I have a few questions and recommendations concerning construction at the Sauget Plant. Jim's memo indicates that all construction in the significantly contaminated area has to have EPA approval. Previously we were given verbal approval for construction of the NC Warehouse expansion which is the area 150E to 280E and out to about 1100N. This area is now classified both "Significantly Contaminated and Undetermined." This affects the construction schedule as well as the design. We need a resolution immediately, so we can proceed in an attempt to get the construction finished before bad weather, this winter.

The undetermined area has several areas which we are looking at for a new unit. We are planning a special reaction unit in the north end of the plant, north of the proposed 3rd street. I would suggest we go ahead and get the sampling of the remainder of the plant finished, so we can proceed with future expansions with minimum or no delay for approval.

We have several projects underway presently in the "released" area, but we are to keep all soil and broken up concrete, asphalt, etc., on site. We have just purchased additional land across the railroad track near 800E and 1400N. We are planning to build a road, parking lot and access gate to the plant for contractor access. We must build up the elevation of this area and I would like to be able to use the rubbish (concrete, etc.) and soil from excavation in the "released" area as fill. This will accomplish two tasks in one by storing the excavation on the plant, and filling in for the parking lot.

I would suggest we use the proposed plant expansion map and identify where we want soil from potentially contaminated areas stored or landfilled (Drawing D-23969). I would suggest we store this fill along the fence where 4th Street is proposed. This street will need little underground work and would be an ideal location to store this type soil. It would give us the easy access in the future if we were required to sample or retrieve the soil.